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VIA ECF

Hon. Andrew S. Hanen
United States District Court
515 Rusk Avenue
Houston, TX 77002

Re: *Schelling v. Microvast Holdings, Inc. et al*, Case No. 4:23-cv-04565

Dear Judge Hanen:

Defendants in the above-referenced action respectfully request oral argument on Defendants' Motion to Dismiss the Amended Class Action Complaint (ECF No. 37) pursuant to Local Rule 7.5.A. and Section 7.K. of the Court's Civil Procedures. The motion is now ripe as Defendants filed their reply brief on September 10, 2024 (ECF No. 43).

Defendants' Motion to Dismiss briefing was primarily drafted by King & Spalding associate Frances Fink, who is a young lawyer as described in Section 7.K of the Court's Civil Procedures. If the Court grants oral argument on Defendants' Motion to Dismiss, Attorney Fink would assume the primary role on behalf of Defendants in the argument.

In addition to providing valuable speaking experience for a young lawyer, we believe that oral argument would benefit the Court as the motion involves a heightened pleading standard under the Private Securities Litigation Reform Act and the Amended Class Action Complaint presents complex and specialized issues of securities law.

We appreciate the Court's consideration of this oral argument request.

Respectfully submitted,

/s/ Paul R. Bessette

Paul R. Bessette

Counsel for Defendants